## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

MARK LENZI,	
Plaintiff,	)
v.	) No. 1:21-cv-1371 (PTG/IDD)
U.S. DEPARTMENT OF STATE and ANTONY J. BLINKEN, U.S. Secretary of State,	) )
Defendants.	)

## **DEFENDANTS' WITNESS LIST**

Pursuant to this Court's order of July 29, 2022, see Dkt. 33, Defendants, through their undersigned counsel, hereby respectfully submits their list of potential witnesses for the trial in the above-captioned matter.

## **WITNESSES**

In accordance with Federal Rule 26(a)(3), the witnesses listed below who are marked with an asterisk are those Defendants expect to present at trial. The additional witnesses designated are those Defendants may call if the need arises. Defendants reserve the right to seek to present testimony of such witnesses by *de bene esse* deposition or through discovery deposition testimony if the witness in question is, unbeknownst to Defendants at the present time, unavailable for trial.

The witness list below reflects the present status of this litigation. Accordingly, Defendants reserve the right to amend this list—including eliminating proposed witnesses—should further litigative developments (including, *inter alia*, positions advanced by Plaintiff and any ruling on summary judgment) warrant.

- 1. Tamika Abbott
- 2. Sumera Ashruf

	3. John Fitzsimmons*
	4. Andrew Kaleczyc*
	5. Joel Lesch
	6. Nathan Lingenfelter*
	7. Kenneth Merten
	8. Raymond Rivera*
	9. Kelly Siekman
	10. Patrick Slowinski*
	11. Ronald Stuart*
	12. Christopher Teal*
	13. Michelle Yelland*
	14. Any witness necessary to authenticate records and/or establish the manner in which
	records were kept.
	15. Any other witnesses designated by Plaintiff to whom Defendants do not object.
	16. Witnesses that may become necessary for rebuttal based on testimony in Plaintiff's case-
	in-chief.
	Defendants may also call other witnesses necessary to respond to any testimony offered by
Plainti	ff which was not previously disclosed.
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Dated: January 18, 2023

JESSICA D. ABER United States Attorney

LAUREN A. WETZLER Chief, Civil Division

/s/

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Respectfully submitted,

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